

October 27, 2021

VIA ECF

The Honorable Barbara Moses
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 20A
New York, NY 10007

Re: *In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation*,
Master File No. 1:17-cv-00916-RA-BCM

Dear Judge Moses:

Plaintiffs 683 Capital Partners, LP, Shipco Transport Inc., Sergey Regukh, Brian Armstrong, and E-Global Trade and Finance Group, Inc., (“Plaintiffs”) and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout (“Defendants” and with Plaintiffs, the “Parties”) submit this joint letter motion proposing to modify deadlines regarding *Daubert* and dispositive motions in the operative Amended Scheduling Order, which the Court entered on March 19, 2021 (ECF No. 231) (“March 2021 Scheduling Order”). The March 2021 Scheduling Order modified the First Amended Scheduling Order, which the Court entered on October 15, 2020 (ECF No. 210), and the Court’s February 16, 2021 Order (ECF No. 227).¹

On September 9, 2021, pursuant to the March 2021 Scheduling Order, Defendants filed briefs in support of two *Daubert* motions and a motion for summary judgment. In light of the length and complexity of Defendants’ motions, Plaintiffs require additional time for their responses. Therefore, the Parties respectfully request the following modifications to the March 2021 Scheduling Order:

1. The deadline for Plaintiffs to submit oppositions to Defendants’ *Daubert* and dispositive motions is extended from November 11, 2021 to December 9, 2021.
2. The deadline for Defendants to submit replies in further support of their *Daubert* and dispositive motions is extended from December 13, 2021 to January 20, 2022.

This is the Parties’ second request to modify the dates for the briefing schedule for *Daubert* and dispositive motions. The Court granted the previous modification request by entering the March 2021 Scheduling Order. The requested extension will not affect any other scheduled dates in this action.

A proposed scheduling order is submitted herewith. We thank the Court for its consideration of this request.

¹ The March 2021 Scheduling Order did not affect the Second Amended Scheduling Order, which the Court entered on December 7, 2020 (ECF No. 225).

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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